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Attorneys for Plaintiff LARRY JUNKER

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LARRY G. JUNKER

Plaintiff,

v.

HDC CORPORATION

Defendant.

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CIVIL ACTION NO. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Larry G. Junker (hereinafter "Plaintiff"), for his Complaint for Patent Infringement against HDC Corporation (hereinafter "HDC"), states and alleges as follows:

1. Plaintiff Larry G. Junker is an individual residing in the State of Florida with a principal address of 8930 Roan Lane East, Inverness, FL 34450, and is the owner of United States Design Patent No. D450,839 entitled "Handle for Introducer Sheath," ("the '839 Patent").

2. Upon information and belief, HDC Corporation, is a corporation organized and existing under the laws of the State of California with a principal place of business at 628

Gibraltar Ct. Milpitas, CA 95035. HDC may be served through its registered agent for service of process Leonard G. Ross at 628 Gibraltar Ct., Milpitas, CA 93035. HDC has committed acts of infringement in this judicial district and is subject to personal jurisdiction in this judicial district.

COUNT I - PATENT INFRINGEMENT

3. This is an action for patent infringement arising under the patent laws of the United States, Title 35 United States Code, Sections 271 *et seq.*

4. Jurisdiction of the subject matter of this action is established under 28 U.S.C. §§ 1331 and 1338. Venue is determined by 28 U.S.C. §§1391 and 1400.

5. On information and belief, HDC has willfully and knowingly made, used, sold and/or offered for sale devices embodying the patented invention that constitute infringement of U.S. Patent No. D450,839 in violation of 35 U.S.C. §271, *et seq.*

6. Plaintiff seeks damages for HDC's infringement in an amount no less than HDC's profit.

WHEREFORE, Plaintiff prays for:

- A. An award of damages for infringement;
- B. An award of attorney fees in this action pursuant to 35 U.S.C. §285;
- C. An award of interest and costs of suit; and
- D. Such other relief as the Court deems proper and just.

Dated: October 1, 2007

/s James D. Petruzzi

James D. Petruzzi

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PLAINTIFF'S JURY DEMAND

Plaintiff demands a trial by jury on all issues that may be so tried.

/s James D. Petruzzi
James D. Petruzzi